

# Sealed

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United States Courts  
Southern District of Texas  
FILED

APR 26 2016

David J. Bradley, Clerk of Court

**Criminal No.**

16 CR 0157

**UNITED STATES OF AMERICA**

**V.**

**MINH LE (Cts. 1-14)**

**a.k.a. “Iso”**

**JOSE CASTRO (Cts. 1-4)**

**a.k.a. “Jay”**

**JOSEPH RATCLIFF (Cts. 1, 12 &15)**

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**Ct. 1 Conspiracy to possess with intent to distribute a controlled substance**

## **Ct. 2 -15 Possession with intent to distribute a controlled substance, aiding and abetting**

**Cts. 1, 11 & 15: 10- life, 10 mil fine,  
at least 5 yrs. SR**

**Cts. 1-10, 12-14: 5 – 40, 5 mil fine,  
at least 4 yrs. SR**

**INDICTMENT**

## THE GRAND JURY CHARGES THAT:

**COUNT ONE**

***[21 U.S.C. 846 - Conspiracy to possess with Intent  
to Distribute a Controlled Substance]***

On or about and between August 6, 2014, and up and until the date of this indictment, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**

a.k.a. "Iso"

**JOSE CASTRO**

a.k.a."Jay"

and

JOSEPH RATCLIFF

**Defendants herein**, together with persons known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally combine, conspire confederate and agree with other persons known and unknown to the Grand Jury, to commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance.

This offense involved fifty (50) grams or more of methamphetamine, a Schedule II controlled

Substance, and (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 846.

**COUNT TWO**

***[21 U.S.C. 841 - Possession With Intent to Distribute;  
18 U.S.C. 2 - Aiding and Abetting]***

On or about August 13, 2014, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"  
and  
**JOSE CASTRO**  
a.k.a. "Jay"

**Defendants herein**, and others known and unknown to the Grand Jury, did knowingly and intentionally aid, abet and assist each other to commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT THREE**

***[21 U.S.C. 841 - Possession With Intent to Distribute;  
18 U.S.C. 2 - Aiding and Abetting]***

On or about September 4, 2014, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"  
**JOSE CASTRO**  
a.k.a. "Jay"

**Defendants herein**, and others known and unknown to the Grand Jury, did knowingly and intentionally aid, abet and assist each other to commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FOUR**

***[21 U.S.C. 841 - Possession With Intent to Distribute;  
18 U.S.C. 2 - Aiding and Abetting]***

On or about September 23, 2014, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"  
and  
**JOSE CASTRO**  
a.k.a. "Jay"

**Defendants herein**, and others known and unknown to the Grand Jury, did knowingly and intentionally aid, abet and assist each other to commit an offense defined in Title 21, United

States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FIVE**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about October 9, 2014, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT SIX**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about October 30, 2014, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT SEVEN**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about December 11, 2014, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT EIGHT**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about January 13, 2015, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT NINE**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about February 10, 2015, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT TEN**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about March 17, 2015, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT ELEVEN**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about April 23, 2015, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved fifty (50) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A).

**COUNT TWELVE**

***[21 U.S.C. 841 - Possession With Intent to Distribute;  
18 U.S.C. 2 - Aiding and Abetting]***

On or about May 12, 2015, in the Southern District of Texas, and elsewhere  
within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"  
and  
**JOSEPH RATCLIFF**

**Defendants herein**, and others known and unknown to the Grand Jury, did knowingly  
and intentionally aid, abet and assist each other to commit an offense defined in Title 21, United  
States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled  
substance. This offense involved fifty (50) grams or more of a mixture or substance containing a  
detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title  
18, United States Code, Section 2.

**COUNT THIRTEEN**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about May 22, 2015, in the Southern District of Texas, and elsewhere  
within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United  
States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled  
substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II  
controlled substance.



In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT FOURTEEN**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about June 2, 2015, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**MINH LE**  
a.k.a. "Iso"

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved five (5) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B).

**COUNT FIFTEEN**

***[21 U.S.C. 841 - Possession With Intent to Distribute]***

On or about October 8, 2015, in the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

**JOSEPH RATCLIFF**

**Defendant herein**, did knowingly and intentionally commit an offense defined in Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance. This offense involved fifty (50) grams or more of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A).

**NOTICE OF CRIMINAL FORFEITURE (21 U.S.C. § 853)**  
***[21 U.S.C. 853 - Criminal Forfeiture]***

Pursuant to Title 21, United States Code, Section 853, as a result of the commission of a violation of Sections 841, and 846, as alleged in Counts 1 through 15, notice is given that the defendants:

**MINH LE**  
a.k.a. "Iso"  
**JOSE CASTRO**  
a.k.a. "Jay"  
**and**  
**JOSEPH RATCLIFF**

shall forfeit to the United States:

1. property constituting or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
2. property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

**Substitute Assets**

In the event that the property that is subject to forfeiture pursuant to Title 21, United States Code, Sections 841 and 846 as a result of any act or omission of the defendants;

6. cannot be located upon exercise of due diligence;
7. has been placed beyond the jurisdiction of the Court;
8. has been transferred or sold to, or deposited with a third party;
9. has been substantially diminished in value;
10. has been commingled with other property which cannot be divided without difficulty;


It is the intent of the United States to seek forfeiture of any other property of the defendant

up to the value of such property, pursuant to Title 21, United States Code, Section 853 (p), and Title 18, United States Code, Section 982 (b)(1) incorporating Title 21, United States Code, Section 853 (p).

**A TRUE BILL**    *U* . . .  
Original Signature on File

KENNETH MAGIDSON  
United States Attorney

By:

  
STUART A. BURNS  
Assistant United States Attorney  
(713) 567-9580